

COOLEY LLP
BOBBY GHAJAR (198719)
(bghajar@cooley.com)
TERESA MICHAUD (296329)
(tmichaud@cooley.com)
COLETTE GHAZARIAN (322235)
(cghazarian@cooley.com)
1333 2nd Street, Suite 400
Santa Monica, California 90401
Telephone: (310) 883-6400

MARK WEINSTEIN (193043)
(mweinstein@cooley.com)

KATHLEEN HARTNETT (314267)
(khartnett@cooley.com)

JUDD LAUTER (290945)
(jlauter@cooley.com)

ELIZABETH L. STAMESHKIN (260865)
(lstameshkin@cooley.com)
3175 Hanover Street
Palo Alto, CA 94304-1130
Telephone: (650) 843-5000

CLEARY GOTTLIEB STEEN & HAMILTON LLP
ANGELA L. DUNNING (212047)
(adunning@cgsh.com)
1841 Page Mill Road, Suite 250
Palo Alto, CA 94304
Telephone: (650) 815-4131

Counsel for Defendant Meta Platforms, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, *et al.*,
Individual and Representative Plaintiffs,
v.
META PLATFORMS, INC., a Delaware
corporation;
Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF SY CHOUDHURY IN
SUPPORT OF META'S OPPOSITION TO
PLAINTIFFS' LETTER BRIEF REGARDING
THE DEPOSITION OF SY CHOUDHURY**

1 I, Sy Choudhury, hereby declare:

2 1. I am Director of Business Development, AI Partnerships at Meta Platforms, Inc.
3 (“Meta”)

4 2. The contents of this declaration are based on my personal knowledge and if called
5 as a witness, would testify to the matters contained herein.

6 3. During my 30(b)(1) deposition on December 5, 2024, I was asked about a meeting
7 regarding a decision to pause publisher outreach in 2023. Counsel for Plaintiffs asked me the name
8 of the in-house counsel involved in that meeting. In response, I answered “Natascha” and stated
9 that I could not remember her last name.

10 4. Upon reflection after the deposition, I recalled that the in-house attorney who
11 participated in the meeting was Mo Metanat, an in-house counsel at Meta who provides legal advice
12 regarding AI matters.

13
14 I declare under penalty of perjury under the laws of the United States of America that the
15 foregoing is true and correct.

16 Executed in Lafayette, California on this 11th day of December, 2024.

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19 Sy Choudhury

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